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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 SHERICE WILLIAMS,
15 Defendant.
16

Case No. 2:15-cr-294-JAD-VCF

UNOPPOSED MOTION TO
MODIFY PRETRIAL RELEASE
CONDITIONS TO REMOVE
TRAVEL RESTRICTION

17 Comes now the defendant, Sherice Williams, by and through her counsel of record,
18 Raquel Lazo, Assistant Federal Public Defender, and hereby files this Unopposed Motion to
19 Modify Pretrial Release Conditions to Remove Travel Restriction. This request is based on the
20 Points and Authorities attached hereto.

21 DATED this 4th day of November, 2016.

22 RENE L. VALLADARES
Federal Public Defender
23

24 By: /s/Raquel Lazo

25 RAQUEL LAZO
Assistant Federal Public Defender
26 Attorney for Sherice Williams

POINTS AND AUTHORITIES

1) On October 28, 2015, Mrs. Williams was released on a PR Bond. *See* Bond (#13). Her restrictions included a travel restriction to Clark County, Nevada.

2) Mrs. Williams respectfully requests this condition be removed. Mrs. Williams would like to travel freely in order to visit her two sons, both of whom reside outside Clark County jurisdiction.

3) Mrs. Williams pretrial services officer, Jeff Cottam, has no opposition. The government similarly has no opposition.

DATED this 4th day of November, 2016.

Respectfully submitted,

By: /s/Raquel Lazo

RAQUEL LAZO
Assistant Federal Public Defender
Attorney for Sherice Williams

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
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4 UNITED STATES OF AMERICA,
5 Plaintiff,
6 v.
7 SHERICE WILLIAMS,
8 Defendant.
9

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PROPOSED ORDER

10 IT IS HEREBY ORDERED that Defendant Sherice Williams, is permitted to
11 travel without restriction outside of the Clark County jurisdiction. However, Ms. Williams
12 shall advise her Pretrial Services Officer in advance of any travel plans that will result in her
13 absence from Clark County for more than two weeks at a time.

14 DATED this 9th day of November, 2016.

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16 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on November 4, 2016, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS TO REMOVE TRAVEL RESTRICTION** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
JOHN PATRICK BURNS
LISA CARTIER-GIROUX
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Brandon Thomas
Employee of the Federal Public Defender